

CHAPTER IV (draft)

MAINTAINING (THROUGH AN ISMS CONFIGURATION CONTROL PROCESS) AN APPROVED ISMS AND REPORTING ISMS STATUS TO DOE ON AN ANNUAL BASIS

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OVERVIEW

Chapters one through three of this guide focus on the initial development, implementation, verification and DOE approval of a contractor's ISMS. This chapter assists DOE and its Contractors in (1) keeping an approved ISMS effective (through an ISMS configuration control process) and (2) describing the actions needed to prepare and submit an annual ISMS update report to DOE for review and approval. This chapter is divided into sections that discuss the annual/continuous actions for DOE and for contractors. Keeping an ISMS current is not another Phase I and Phase II verification. It is establishing an effective ISMS configuration control process and making the appropriate adjustments as lessons are learned and budgets and missions change.

The Contractor and DOE are responsible for ensuring that approved ISMS descriptions are controlled by an effective configuration control process that reflects the current mission, program objectives, and budget direction from DOE on an ongoing basis. Information on ISMS performance such as: performance measures, performance indicators, self-assessment findings, independent assessment findings, and other relevant feedback should be factors in their ISMS configuration control process. Basically, the DEAR requires contractors to review and update their approved ISMS, for DOE approval, to reflect these ongoing activities and factors.

The guidance in this chapter will evolve as ISMS matures throughout the complex.

The DEAR, 48 CFR 970.5204-2 (d) and (e), requires DOE and contractor actions to continuously maintain the integrity of ISMS and to generate an annual report. The DEAR requirements are:

“(d) The system shall describe how the Contractor will establish, document, and implement safety performance objectives, performance measures, and commitments in response to DOE program and budget execution guidance while maintaining the integrity of the system. The system shall also describe how the Contractor will measure system effectiveness.”

“(e) On an annual basis, the contractor shall review and update, for DOE approval, its safety performance objectives, performance measures, and commitments consistent with and in response to DOE’s programs and budget execution guidance and direction. Resources shall be identified and allocated to meet the safety objectives and performance commitments as well as maintain the integrity of the entire System. Accordingly, the System shall be integrated with the Contractor's business process for work planning, budgeting, authorization, execution, and change control.”

Additionally the DEAR, 48CFR970.5204-86, has a section which requires the sustaining of an effective ISMS in order to earn contract fees.

"(a) If the contractor fails to ...achieve the minimum performance requirements of the System during the evaluation period, DOE ...may reduce...fees..."

DOE and the contractor are responsible for a number of efforts to maintain the effectiveness of the ISMS and to perform an annual review.

-- **CONTRACTOR ANNUAL AND CONTINUOUS ACTIVITIES SUCH AS:**

- Reviewing the status of post facility ISMS verification activities that include completion of the implementation process, resolution of opportunities for improvement identified by the verification process, and expanding noteworthy practices as appropriate (see section 4.1.1 for details).

- Selecting appropriate performance measures and indicators. Improving the adequacy and effectiveness of the ISMS on a continuing basis in response to the measures and indicators (see section 4.1.2 for details).
- Submit ISMS annual update report.
- Establishing an effective ISMS configuration control process.
- **DOE ANNUAL AND CONTINUOUS ACTIVITIES** (see section 4.2 for details);
- Developing and promulgating program and budget execution guidance as well as direction to the contractor concerning safety performance objectives, performance measures, and ISMS Description revisions.
- Assessing/self-assessing of contractor's and DOE's performance in compliance with organizational and departmental ISM requirements.
- DOE line oversight of contractor's ISMS and the review and approval of the contractors' annual ISMS update report.

-- **ADDITIONAL CONSIDERATIONS:**

- Conditions and considerations that could lead to a re-verification of either the Contractor ISMS Description (Phase I) or of the implementation of a satisfactory Description (Phase II). Situations in which this discussion is relevant might include: (1) a change of Contractor requiring a significant revision to the approved Description; (2) a situation in which the assessment results of an EH-2 Safety Management Evaluation (SME), a series of safety problems, problems found in readiness reviews, or other indicators that call the adequacy of the system or related processes into question (see section 4.3 for details)
- A major change of mission at a particular Site or facility (see section 4.1.3 for details).
- Changes to federal, state, and local laws and regulations as well as changes to DOE directives (see section 4.1.4 for details).

DOE and contractors in doing this annual ISMS review will either rely on the performance measures, performance indicators and their ISMS configuration control processes or they can use a series of review questions in section 4.4. Contractors should address the relevant issues from either method in their annual ISMS submittal. The questions in section 4.4 should help DOE to review the annual submittal. The review is not another verification, rather it is the integration of numerous system related activities in a manner that assists management in assuring that work is performed safely.

4.1 DETAILED DISCUSSION OF CONTRACTOR ISMS UPDATING AND MAINTAINING ACTIVITIES

4.1.1 POST VERIFICATION ACTIVITIES-VERIFICATION FOLLOW-UP /ACTIONS IDENTIFIED IN PREVIOUS ANNUAL ISMS UPDATE REPORTS

At the completion of the ISMS Implementation Verification (Phase II), some implementation issues may remain. These are documented in the Verification report. These items should be included in the configuration control of the ISMS. The status of these identified issues should be addressed in the annual ISMS submittal. Likewise, the status of issues and actions identified in previous annual ISMS update reports and EH-2 Safety Management Evaluations should be addressed.

4.1.2 CONTRACTOR ACTIVITIES TO SUSTAIN, MEASURE, AND UPDATE A SATISFACTORY ISMS

Sections (d) and (e) of the referenced DEAR Clause require the Contractor to develop safety performance objectives, performance measures and commitments, and to update them on an annual basis. Those paragraphs also require the Contractor to measure ISM System effectiveness and on an annual basis to identify and allocate resources to meet both the safety objectives and performance commitments, and maintain the integrity of the system. As identified in ISMS function five , this effort should “...continue to improve safety management.” If the results of this activity require changes to the System Description, they SHOULD ADDRESS those changes in the annual ISMS submittal to DOE for approval. These performance measures and evaluations should be factored into the configuration control of the ISMS as well.

Annually, the contractor is required to “update the performance measures and safety commitments.” Each performance measure and safety commitment should be carefully analyzed and the results considered in the contractor annual update report. Typically the following types of activities may be considered:

- Evaluate the effectiveness of performance measures and commitments. Determine reasons for success or failure of those commitments.
- Review Occurrence Reports and corrective actions for ISMS improvement opportunities.
- Review facility safety data, identify safety issues to develop improvements required in Site ISMS.
- Review worker or operator suggestions from the Employee Concerns Program and employees’ safety organizations.
- Review DOE program and budget execution guidance and direction.

DOE P 450.5 and Order 414.1 require a rigorous and credible Contractor ES&H self-assessment program linked to the Integrated Safety Management System, which includes elements that address the following: (1) performance measures and performance indicators, (2) line evaluations and independent evaluations, (3) compliance with applicable requirements, (4) data collection, analysis, and corrective actions, and (5) feedback and performance improvement.

Contractor's independent assessments can provide senior management with information concerning ISMS. Some Sites have found an operational review board (Facility Evaluation Board) to be very useful in providing objective evidence concerning the status of implementation of ISMS.

Based on this information the Contractor's annual update report to DOE should discuss any needed changes such as:

- corrective actions for functional safety program integration issues;
- corrective actions to improve ISMS implementation and effectiveness;
- performance measures and commitments for the next year ;
- any changes required in a self and independent assessment focus or criteria; and
- any changes, if required, to an ISMS Description document.

The contractor determines if the ISMS needs to be modified, updated or otherwise revised in the annual review and approval process. The Contractor reviews outstanding issues from previous ISMS verification reviews, from previous ISMS annual reviews, from current DOE and Contractor assessments, from performance measures and performance indicators, and from recent DOE program reviews and inspections.

The contractor should use the results of this process to evaluate and improve the overall ISMS using the ISNS configuration control process and should discuss the results in their annual update report to DOE.

The contractor may also address all applicable questions in section 4.4 in preparing the annual update report.

Strict configuration control of the ISMS Description is required by the DEAR and is the key element in maintaining the ISMS current. Therefore, Contractors should have configuration control processes and procedures for the ISMS Description. Per the DEAR, revisions to the ISMS must be approved by the same level of approval as the initial document.

4.1.3 INTRODUCTION OF A MAJOR NEW FACILITY OR MAJOR MISSION CHANGE WITHIN AN EXISTING FACILITY

During the annual budget process, new major facilities or activities, or major mission changes will need to be carefully integrated into the system. A new facility or program may require a significant revision to a Site or facility ISMS in response to new hazards or potential environmental impacts. If the new facility or process does not fit within the existing ISMS Description the contractor's configuration control process should update the ISMS otherwise, the contracting officer should direct the contractor to revise and resubmit the ISMS Description to reflect the modification. Once the revised ISMS Description is approved, the contractor will be expected to implement the revisions to the system. Additionally, the contracting officer should develop a DOE review plan that includes appropriate verification elements to ensure that an updated viable and effective ISMS is in place before work is authorized.

4.1.4 CHANGES TO LAWS REGULATIONS AND DIRECTIVES

The contracting officer may revise List B (970.5204-78) to reflect changes to DOE directives. DEAR 970.5404-78 requires ISM Systems to assess the impact of such changes and to advise the contracting officer accordingly. Changes to federal, state, and local laws and regulations should be included in the

configuration control process. These changes may require changes to both the ISMS Description and implementation.

4.2 DETAILED DISCUSSION OF DOE REQUIRED ACTIVITIES RELATED TO ISMS CONTINUAL EVALUATION AND THE ANNUAL UPDATING OF ISMS

The DEAR, the Manual of Safety Management Functions, Responsibilities, and Authorities (FRAM), and DOE Policies assign numerous requirements to DOE field and headquarters elements for sustaining the Integrated Safety Management Systems within the DOE Complex. The policies include P 450.4, *Safety Management System Policy*; P 450.5, *Line Management, Safety and Health Oversight*; P 450.6, *Secretarial Policy Statement, Environment, Safety and Health*; and P 411.1, *Safety Management Functions, Responsibilities, and Authorities Policy*. The DOE ISMS annual and continuous activities in general are:

- The development of and promulgation of budget and budget execution guidance as well as direction to the Contractor concerning safety performance objectives, performance measures, and ISMS Description revisions. This activity also includes review and approval of the Contractor's responses to this direction and guidance.
- Assessment/self-assessment of contractor's and DOE's performance in compliance with organizational and departmental ISM requirements and expectations. This includes periodic reviews and updates of the DOE Safety Management System documentation.
- DOE oversight of Contractor's Integrated Safety Management implementation and performance.

The activities characterized in the above three bullets however are only a simplification of the actual requirements that DOE must perform continuously and annually for ISM. THERE ARE A LARGE NUMBER OF REQUIREMENTS FOR DOE RELATIVE TO ANNUAL AND CONTINUOUS ACTIONS WHICH MUST BE CONDUCTED AND INTEGRATED BY THE CONTRACTING OFFICER. BECAUSE THERE ARE SO MANY REQUIREMENTS FOR DOE AND BECAUSE THEY ARE NOT IN ONE DIRECTIVE BUT ARE SCATTERED IN DIRECTIVES, POLICIES, RULES AND MANUALS THIS SECTION COLLECTS THE REQUIREMENTS IN ONE PLACE FOR DOE.

DOE contracting officers should therefore develop procedures for conducting their continuing and annual ISMS reviews that address ALL of the DOE requirements which are presented in the next SIX pages.

DOE REQUIREMENTS FOR SUSTAINING ISMS AND CONDUCTING ANNUAL REVIEWS/APPROVALS

Development and promulgation of budget and budget execution guidance and direction to the Contractor relative to safety performance objectives, performance measures and ISMS

Description revisions. These activities include the DOE review and approval of Contractor's response to the direction and guidance.

In accordance with the FRAM, section 9.1, the CSO prepares and submits the mission direction to the Field Element Manager (FEM) as part of the annual program guidance exercise. The program guidance is also provided to the Contractor in the form of budget and budget execution guidance. An important element of the budget guidance and development process is the annual updating of the ISMS, as required. The following paragraphs show the requirements related to mission and budget aspects.

DEAR 970.5204-2 (e) requires as a part of the budget cycle, that the Contractor shall annually review and update for DOE approval its safety performance objectives, performance measures, and commitments consistent with and in response to DOE's program and budget execution guidance and direction.

FRAM 9.2.4 requires that the FEM "review and support development of expected performance objectives and related CSO priorities."

FRAM section 9.1.5 requires the annual budget process interactions between the CSO and the FEM to assure balanced priorities.

FRAM section 9.2.1 specifies that "each field element is expected to develop appropriate documents delineating its plan of work, including scope, schedule, and funding allocations for each fiscal year."

One element of the documents delivered to the Contractor is the budget guidance containing the DOE expectations for safety performance objectives, performance measures, and commitments.

DOE P 450.5 specifies that "[Department and contractor line] work together to develop ES [Environment Safety and Health] performance objectives, measures, and expectations tied to Department strategic goals and objectives, as well as to performance goals and objectives of the Safety Management System elements. Mutual agreement is reached on expected ES performance." The measures found in this documented agreement are a part of the annual review assessment.

Assessment/self-assessment of DOE's performance

An effective feedback and improvement process should be in place within DOE ensuring that ISM is effective. The feedback and improvement process should not only assess the adequacy of ISM implementation of the specific requirements, but also identify what is needed to update or revise the documentation that defines the requirements. Feedback and improvement process activities and

requirements are specified for both DOE headquarters and field elements. The following requirements are for DOE personnel to review and assess key aspects of ISMS.

DOE P 411.1 requires that “[e]ach line, support, oversight, and enforcement organization within the Department is responsible for establishing and documenting how the specific functions and responsibilities assigned to in the manual are properly discharged. Separate organizational and operating documents will be prepared by each organization to define how its functions are to be carried out and identify who has the responsibility and authority to do so. Each Department organization responsible for a defined safety management function must communicate those functions and associated responsibilities and authorities to their employees so that they are clearly understood.” A key element of the DOE feedback and improvement process should include keeping the Integrated Safety Management documentation up to date as well as verification of adequate implementation of the requirements.

DOE P 450.5 assigns Headquarter’s line management with ES oversight functions of the DOE field elements including monitoring field element performance through review of information; participating in field element appraisals, assessments, surveillance, or walkthroughs; and, conducting onsite reviews of field element performance, including verification of their appraisals of the Contractor.

The FRAM 9.2.4 requires the CSO to “review and provide guidance to the FEM regarding the safety management system and its ability to ensure that mission and safety expectations can be met within budget constraints.”

FRAM 9.4.3.3 requires the CSO to “[e]nsure systems are in place for development and implementation of appropriate authorization protocols, including protocol for assessment support to the FEM.”

FRAM 9.6.1 requires the CSO to “[i]mplement a lessons-learned program and remain cognizant of information likely to be useful in improving the performance of the programs under the offices direction.

Collect information for use in this program from performance assessments of Contractor and field element operations.”

FRAM 9.6.1.4 requires all DOE elements to “perform assessments of their own organizations to identify areas in which continuous improvement in the safety of DOE operations can be realized.”

FRAM 9.6.2 tasks all DOE elements to “continuously improve the efficiency and quality of operations; develop, implement, and track corrective actions in order to profit from prior experience and the lessons learned.”

FRAM 9.6.3.2 tasks CSO to monitor field elements and Contractor performance to assess the success of programs in fostering safe work activities.”

FRAM 9.1.6.1 tasks the FEM with implementation of the Federal Technical Program for their organization and ensuring that personnel are qualified to perform their safety management functions.

DOE oversight of Contractor's Integrated Safety Management implementation and performance

The purpose of DOE P 450.5 “is to set forth the departments expectations for Department of Energy line management environment, safety and health (ES) oversight.” ...[and]... “DOE line oversight and contractor self-assessment together ensure that field elements and Contractors are adequately implementing the DOE Safety Management System.” ...[and]... “This policy statement applies to DOE Headquarters and field element line organizations and to contractors.”

DOE has a significant role to play through the oversight and assessment process to ensure that the ISMS within the Contractor’s organization remains effective and robust. As specified in DOE P 450.5,

an important element of achieving the measurable and sustained results is the oversight and assessment of the Contractor's ISMS by DOE.

DOE P 450.5 describes the steps to achieve the situation in which a robust, rigorous, and credible Contractor ES self-assessment program linked to the DOE Safety Management System is in place. Prior to achieving the required self-assessment program, DOE direct oversight of the Contractor's operations is more frequent and more intense. As an effective Contractor self-assessment program is established, DOE field element oversight function changes to operational awareness through evaluation of ES performance measures and indicators, required readiness reviews, ISMS documentation reviews, authorization basis documentation and implementation reviews, and periodic, value added appraisals of sufficient duration to confirm the contractors safe performance of work. Focused, planned, and structured actions are required of DOE in order to meet the expectations of P 450.5. These structured oversight and assessment efforts will ensure that the ISMS achieves measurable and sustained results.

Moreover, the DOE Office of Independent Oversight, EH-2, conducts independent evaluations of Contractors and DOE line implementation of ISMS and reports their findings to DOE cognizant line managers, Program Secretarial Officers, and to the Secretary of Energy. The EH-2 reporting system for these findings has been formalized and utilizes a DOE-wide, web-based computerized reporting and tracking system for managing EH-2 oversight findings of ISMS. Line management is responsible for developing approved corrective action plans in response to EH-2 findings.

DEAR section 48 CFR 970.5204-86 is the conditional fee clause that includes minimum requirements for ES&H including specific expectations associated with the ISMS Description approval and implementation. In order to comply with the specified contract clause, DOE will conduct oversight and focused evaluation of the contractor's ISMS. The process discussed in this chapter will support that

required oversight and evaluation as well as be supported by the results of the DOE oversight and evaluation for purposes of determining the ISMS affect on the fee.

The FRAM defines the following oversight and assessment requirements for DOE:

FRAM 9.4.2.1 and 9.4.2.2 require the FEM to “direct the contractor to prepare documentation for the prevention and mitigation of hazards. Review the adequacy of the controls and their documentation.” It also specifies that the FEM “provide line management oversight and ensure the implementation of hazards mitigation programs and controls.”

FRAM 9.4.3.1 requires the FEM to “direct preparation of the authorization basis and associated safety documentation and oversee implementation by the contractor.”

FRAM 9.4.4 requires the FEM to “monitor the proper implementation of controls, including contractor processes for unreviewed safety questions and configuration management.”

FRAM 9.5.2 requires the FEM to “perform line management oversight of contractors’ worker, public, environment, and facility protection programs” ...[and]... “maintain day-to-day operational oversight of contractor activities at applicable facilities.”

FRAM 9.5.3 requires the FEM to “ensure proper implementation of quality assurance programs by DOE and the contractor.”

FRAM 9.6.3.2 requires the FEM to “perform management assessment of contractors to evaluate their success in doing work safely;” ...[and]... “review performance of the contractor against formally established ES&H performance measures and other ES&H performance indicators, and take appropriate action.”

The above requirements will require DOE to perform related activities and reviews which will result in a oversight and assessment of the Contractors' ISM program and provide important assessments that the contracting officer will need as he/she evaluates the Contractors annual ISMS update report per the DEAR requirements.

Based on the above actions and responsibilities the DOE contracting officer must approve (or reject) the contractors annual ISMS update submittal.

4.3 ADDITIONAL CONSIDERATIONS FOR PERFORMING ANOTHER PHASE I OR II VERIFICATION

Once an ISMS is initially developed, verified and approved, there are no specific requirements to repeat the verification process and an effective configuration control process should maintain the ISMS to reflect the current status. However in a few circumstances, the contracting officer may require all or some portion of the verification process be repeated. The following circumstances are examples of those that might result in a need for a re-verification.

4.3.1 LOSS OF CONFIDENCE IN THE ADEQUACY OF THE EXISTING ISMS

The Contractor and DOE have available many different indicators of the adequacy of the ISMS at a Site. These indicators include the performance measures that must be reviewed and updated annually in accordance with the DEAR, and the DOE program and budget execution guidance and direction.

The assessment process specified by DOE P 450.5 should provide an overall assessment of the effectiveness of the ISMS. Reports of events through various reporting systems, such as ORPS, provide evidence as to the overall effectiveness of the ISMS. Formal investigations of events are also important sources of information into the effectiveness or adequacy of the ISMS. Note, if a facility has been "shut down" for untoward events such that an ORR is then required for restart, DOE O 425.1A

requires that the ORR team evaluate or comment on the ISM System. The ORR team could then provide the HCA with the ISMS implementation status without a separate review.

Formal assessments, such as SMEs conducted by the independent EH Office of Oversight, are another input on the effectiveness of the ISMS. Noted before, Operational Readiness Reviews provide an assessment of the ISMS associated with the facility. Price Anderson Enforcement Actions also provide indications that should be considered. The Contractor's independent line assessment results are also an important input to the determination of the overall effectiveness of the ISMS. Continuing observations such as those made by the DOE Site Representatives or the DNFSB Site Representatives also provide information on the effectiveness of the ISMS.

In the situation where the Contractor or DOE are seeing a decrease in ISMS effectiveness or when the ISMS effectiveness within a specific facility or area is severely degraded, it may be appropriate to consider a re-verification of the ISMS. Additionally, if the contracting officer finds that the ISMS configuration control process is ineffective it may be necessary to reverify aspects of ISMS.

4.3.2 CHANGE OF CONTRACTOR DURING WHICH THE ISMS IS SUBSTANTIALLY MODIFIED

If a new Site Contractor is chosen or if significant changes in a Contractor's organization or subcontractor organization has taken place and if this cannot be handled by the configuration control process, there may be a need to re-review all or parts of an approved ISMS.

The management processes that a new Contractor will use should be discussed in their proposal. DOE Requests for Proposals should specify the utilization of the currently approved ISMS or should specify how the ISMS should be modified.

4.4 REVIEW QUESTIONS FOR CONDUCTING ANNUAL REVIEWS OF ISMS

Sections 4.1, 4.2 and 4.3 discuss the activities that DOE and the Contractor should consider to ensure that the effectiveness of the ISMS is sustained. Approved ISMSs that have effective performance measures, performance indicators and an effective ISMS configuration control process should have all the tools necessary to continuously maintain and sustain their ISMS descriptions and thereby readily obtain key information to satisfy the annual reporting requirement.

The following statements are a compendium of relevant topics and issues that can also be used to shape the evaluation of the effectiveness of the ISMS. This listing may be used by both contractor and DOE.

CCE -1. The annual update process has been completed.. DOE direction was provided as part of the annual program and budget execution guidance including direction regarding major mission changes. The Contractor updated the safety performance objectives, performance measures, and commitments so that they reflect and promote continual improvement and address major mission changes, as required. The ISMS Description has been reviewed, updated and submitted for approval if required.

CCE -2. System effectiveness, measured as described in the Contractor's ISM Description, is satisfactory. Safety performance objectives, performance measures, and commitments were met or exceeded, and that they remain appropriate for next year.

CCE -3. Work activities reflect effective implementation of the functions of ISMS. Work is defined. Hazards are identified. Controls are developed and implemented. Work is properly authorized. Work is accomplished within controls. Appropriate worker involvement is a priority. (Work is intended to mean all maintenance, operations, experiments, etc. that occur at the activity level).

CCE-4. Contractor and DOE implementing mechanisms continue to support the principles of ISMS. Promulgated roles and responsibilities are clear. Line management is responsible for safety. Required competence is commensurate with responsibilities and the technical and safety system knowledge of managers and staff continue to improve.

CCE -5. Contractor and DOE budget processes continue to ensure that priorities are balanced. Budget development and change control processes ensure that safety is balanced with production. Facility procedures ensure that production is balanced with safety.

CCE -6. An effective feedback and improvement process, using progressively more demanding criteria, is functioning at each level of the organization from the worker and individual activities through the facilities and the Site, including by and within DOE. The expectations of DOE P 450.5 are in place. Issues management is effective, and consistent with approved implementation plans. Issues identified in ISMS verifications and previous ISMS annual update reviews are effectively addressed.

CCE -7. The process for effecting changes to the standards and requirements identified in the Contract per DEAR List A and List B revisions is being utilized and is effective. Authorization Agreements and Authorization Envelope documentation is maintained current. Mission changes are reflected. Changes in agreed upon standards are included. An effective, dynamic process is apparent.

CCE -8. Performance objectives and criteria (POC) guidance for Contractor and DOE assessments focus the reviews on the adequate implementation of the functions and the principles of Integrated Safety Management in a manner consistent with the approved ISMS Description. Assessments utilize the POCs. Reports reflect the status of ISMS implementation.

CCE -9. Relevant records reflect an improving ISMS. Records include routine DOE and Contractor self-assessment reports, independent and focused assessment reports, incident investigations,

occurrence reports, PAAA enforcement action reports, and other relevant documentation that provide evidence as to the status of implementation, integration, and effectiveness of the Integrated Safety Management system. Configuration control of contractor ISMS description is in place and effective.

CCE-10. DOE ISMS procedures and mechanisms are in place to ensure that work is formally and appropriately authorized and performed safely. DOE line managers are involved in the review of safety issues and concerns and have an active role in authorizing and approving work and operations.

CCE-11. DOE ISMS procedures and mechanisms are in place to ensure that hazards are analyzed, controls are developed, and that feedback and improvement programs are in place and effective. DOE line managers are using these processes effectively, consistent with FEM FRAM and DOE FRAM requirements.